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APPLE INC., A California Corporation

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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**  
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14 MARC OPPERMAN, et al.,  
15 Plaintiffs,  
16 v.  
17 PATH, INC., et al.,  
18 Defendants.

Case No.: 13-cv-00453-JST

**NOTICE OF FILING OF PROPOSED  
PROTECTIVE ORDER WITH REVISED  
PATENT PROSECUTION BAR PROVISION**

THE HONORABLE JON S. TIGAR

THIS DOCUMENT RELATES TO ALL CASES:

*Opperman v. Path, Inc.*, No. 13-cv-00453-JST  
*Hernandez v. Path, Inc.*, No. 12-cv-1515-JST  
*Pirozzi v. Apple, Inc.*, No. 12-cv-1529-JST  
*Gutierrez v. Instagram, Inc.*, No. 12-cv-6550-JST

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22 TO THE COURT AND ALL PARTIES OF RECORD:

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24 PLEASE TAKE NOTICE that Defendants hereby submit a Proposed Protective  
25 Order with a revised patent prosecution bar provision conforming to the Court’s January  
26 9, 2014 Order Re: Joint Letter Brief Regarding Protective Order Dispute (Dkt. No. 440).  
27 The revised Protective Order, attached hereto as Exhibit A, omits the previous language  
28 regarding acquisition of patents and specifies that the prosecution bar applies not to all

1 Plaintiffs' counsel that are members of the patent bar, but only to Messrs. Carlin and  
2 Schwenker. All Defendants have agreed to the revised language contained in Exhibit A.

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4 DATED: January 23, 2014

Respectfully submitted,

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